

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION**

CIVIL ACTION NO. 04-30177 KPN

**JOEL PENTLARGE,
Plaintiff,**

v.

**Robert Murphy, et al.,
Defendants.**

**MOTION TO EXTEND TIME OF DEFENDANTS
DEBORAH O'DONNELL AND NATALYA PUSHKINA**

Deborah O'Donnell and Natalya Pushkina, employees of Forensic Health Services, Incorporated (collectively, the "FHS Defendants"), hereby request that the Court extend the time for them to file a response to the plaintiff's complaint, amended complaint and supplemental complaint filed to date in this action.

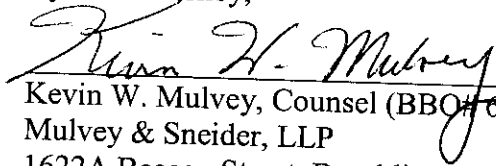
The FHS Defendants are filing herewith a Motion for a Procedural Order and Extension of Time ("FHS Defendants' Motion"). In the FHS Defendants' Motion, the FHS Defendants have requested that the Court order the plaintiff to set forth all of his claims in a single amended complaint. The FHS Defendants also requested that the Court then grant them 30 days from the date of the filing of that amended complaint to respond. For the reasons stated in the FHS Defendants' Motion, the FHS Defendants request that, if the Court grants the DOC Defendants' Motion, the Court extend the time for them to respond until 30 days from the date of the filing of the amended complaint. If the Court denies the FHS Defendants' Motion, the FHS Defendants request 30 days from the date

of the denial in order to respond to the plaintiff's existing complaint, amended complaint and supplemental complaint.

WHEREFORE, the FHS Defendants respectfully request that this Court allow this motion.

Respectfully submitted,
Deborah O'Donnell and Natalya Pushkina

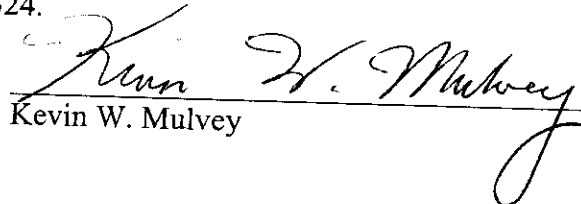
By their attorney,


Kevin W. Mulvey, Counsel (BBO# 642914)
Mulvey & Sneider, LLP
1622A Beacon Street, Brookline, MA 02446
617-278-1881 Ext. 2
617-278-1888 (Fax)

Dated: December 27, 2004

Certificate of Service

I hereby certify that a copy of the within document was sent via first class mail to the pro se plaintiff, Joel Pentlarge at the Nemasket Correctional Facility, 30 Administration Road, Bridgewater, MA 02324.


Kevin W. Mulvey

Dated: December 27, 2004